

Daniel L. Abrams (DA 7258)
Law Office of Daniel L. Abrams, PLLC
Attorney for Plaintiffs
2 Penn Plaza, Suite 1910
New York, New York 10121
(212)292-5663

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
MALIK M. HASAN and SEEME G. HASAN, :
:
Plaintiffs, :
:
v. : 08 Civ. 3189 (GBD)
:
AMERICAN ARBITRATION ASSOCIATION, :
INC., :
:
Defendant. :
:
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NOTICE OF MOTION FOR INJUNCTION PENDING APPEAL

PLEASE TAKE NOTICE, that upon the Declaration of Glenn W. Merrick, dated April 28, 2008, exhibits thereto (Docket Entry #4), the Report of Expert Opinions of Professor Seth E. Lipner, dated April 28, 2008, exhibit thereto (Docket Entry #5), the accompanying Memorandum of Law, dated June 30, 2008, the Verified Complaint in this matter, and all prior proceedings, Plaintiffs Malik M. Hasan and Seeme G. Hasan will move this Court for an Order, pursuant to Federal Rule of Civil Procedure 62(c), for an injunction pending appeal preserving the status quo by directing the Defendant to suspend proceedings in AAA Arbitration Case No. 13 168 01990 04 (*Hasan et al. v. Goldman Sachs 1998 Exchange Place Fund, L.P. et al.*) (hereinafter “the New York Arbitration Panel”), pending the outcome of an appeal to the Second Circuit.

Dated: June 30, 2008.

Respectfully submitted,

Daniel L. Abrams (DA 7258)
Law Office of Daniel L. Abrams, PLLC
2 Penn Plaza, Suite 1910
New York, NY 10121
Telephone: (212) 292-5663
Facsimile: (646) 536-8905
Dan@LawyerQuality.com

G.W. MERRICK & ASSOCIATES, LLC

Glenn W. Merrick
Marc Schatten
Suite 912, 5445 DTC Parkway
Greenwood Village, Colorado 80111
Telephone: 303-831-9400
Facsimile: 303-771-5803
gwm@gwmerrick.com

ATTORNEY FOR PLAINTIFFS MALIK
HASAN, M.D. and SEEME G. HASAN